

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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| FRED HAYNES, et al., |) | CASE NO.: 1:23-CV-00012 |
| |) | |
| Plaintiff, |) | JUDGE CHARLES E. FLEMING |
| |) | |
| vs. |) | <u>UNOPPOSED MOTION FOR</u> |
| |) | <u>EXTENSION OF THE DISCOVERY</u> |
| SHANE SLATER, et al., |) | <u>DEADLINE</u> |
| |) | |
| Defendants. |) | |

Now come Defendants who hereby move the Court for an extension of the fact discovery deadline from June 30, 2023 until July 24, 2023. For cause, the depositions of Plaintiffs Haynes and Money Penny have been scheduled on multiple occasions prior to the discovery cutoff, but due to circumstances beyond the control of counsel for either side, the depositions have had to be re-scheduled. The Parties have agreed to conduct the depositions of Plaintiffs on Friday July 21, 2023. Accordingly, Defendants request that this Motion be granted.

Respectfully submitted,

/s/ **John D. Latchney**

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